

## **Exhibit A**

**Rule 2004 Subpoenas Comparison**

<b>Current Rule 2004 Subpoena Requests</b>	<b>Original Rule 2004 Subpoenas Requests</b>
<p>1. Documents and Communications concerning any Subsequent Transfer.</p>	<p>39. All documents concerning the liquidation of any of your hedge fund investments or related transactions, including without limitation any swap or derivative transaction, from January 1990 to the present.</p> <p>48. All documents concerning your or any other person's investment or transaction with Madoff, any Madoff Fund, or any other person that invested or transacted with Madoff, directly or indirectly, including without limitation: (a) monthly statements, including account numbers; (b) historical account balance information; (c) incoming and outgoing wire transfer records; (d) copies of checks (front and back), both deposited and drawn; (e) records reflecting cash activity; (f) account opening documents; (g) subscription agreements; (h) administrative or custodial agreement; (i) account closing documents; (j) redemption or liquidation requests; (k) all correspondence with fund personnel; (l) securities trade tickets and confirmations; and (m) periodic investment performance reviews and commentary.</p> <p>49. All documents concerning payments, subscriptions, or redemptions made by or to investors in any investment, accommodation, service or transaction offered, issued, executed, made or proposed to be made by you or any other person that was in any way related, linked or indexed to, invested in or secured or hedged by an investment in Madoff, any Madoff Fund or any person that invested or transacted with Madoff, directly or indirectly.</p>

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	<p>51. All documents concerning remuneration, fees, commissions, compensation, revenues, profits, expenses, losses, reserve derived or resulting from any investment, accommodation, service or transaction offered, issued, executed, made or proposed to be made by you or any other person that were in any way related, linked or indexed to, invested in or secured or hedged by an investment in Madoff, any Madoff Fund or any other person that invested or transacted with Madoff, directly or indirectly.</p>
<p>2. Documents concerning money, property, or anything else of value received by Prince from any Person in exchange for any Subsequent Transfer.</p>	<p>39. All documents concerning the liquidation of any of your hedge fund investments or related transactions, including without limitation any swap or derivative transaction, from January 1990 to the present.</p> <p>48. All documents concerning your or any other person's investment or transaction with Madoff, any Madoff Fund, or any other person that invested or transacted with Madoff, directly or indirectly, including without limitation: (a) monthly statements, including account numbers; (b) historical account balance information; (c) incoming and outgoing wire transfer records; (d) copies of checks (front and back), both deposited and drawn; (e) records reflecting cash activity; (f) account opening documents; (g) subscription agreements; (h) administrative or custodial agreement; (i) account closing documents; (j) redemption or liquidation requests; (k) all correspondence with fund personnel; (l) securities trade tickets and confirmations; and (m) periodic investment performance reviews and commentary.</p> <p>49. All documents concerning payments, subscriptions, or redemptions made by or to investors in any investment,</p>

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	accommodation, service or transaction offered, issued, executed, made or proposed to be made by you or any other person that was in any way related, linked or indexed to, invested in or secured or hedged by an investment in Madoff, any Madoff Fund or any person that invested or transacted with Madoff, directly or indirectly.
3. Documents concerning money, property, or anything else of value received by Montpelier International from any Person in exchange for any Subsequent Transfer.	<p>39. All documents concerning the liquidation of any of your hedge fund investments or related transactions, including without limitation any swap or derivative transaction, from January 1990 to the present.</p> <p>48. All documents concerning your or any other person's investment or transaction with Madoff, any Madoff Fund, or any other person that invested or transacted with Madoff, directly or indirectly, including without limitation: (a) monthly statements, including account numbers; (b) historical account balance information; (c) incoming and outgoing wire transfer records; (d) copies of checks (front and back), both deposited and drawn; (e) records reflecting cash activity; (f) account opening documents; (g) subscription agreements; (h) administrative or custodial agreement; (i) account closing documents; (j) redemption or liquidation requests; (k) all correspondence with fund personnel; (l) securities trade tickets and confirmations; and (m) periodic investment performance reviews and commentary.</p> <p>49. All documents concerning payments, subscriptions, or redemptions made by or to investors in any investment, accommodation, service or transaction offered, issued, executed, made or proposed to be made by you or any other person that was in any way related, linked or indexed to,</p>

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	invested in or secured or hedged by an investment in Madoff, any Madoff Fund or any person that invested or transacted with Madoff, directly or indirectly.
4. Documents or Communications concerning any procedures, guidelines, and/or policies for investing, redeeming, or monitoring BLMIS investments through Legacy Capital, Montpelier International or Prince.	<p>2. All documents concerning any Madoff Fund, including without limitation Fairfield Greenwich and Tremont.</p> <p>3. All documents concerning any person other than any Madoff Fund that invested or transacted with, or whose funds were proposed to be managed by, Madoff, directly or indirectly.</p> <p>5. All documents concerning communications between you and any Madoff Fund, including without limitation Fairfield Greenwich and Tremont.</p> <p>7. All documents concerning investment, managerial, performance, operational, back office and other due diligence reviews, investigations, examinations, analyses, deliberations, meetings or recommendations, including but not limited to any business, legal, compliance, credit, financial, operational, quantitative, reputational, risk, suitability, or supervisory assessment or evaluation, by you or any other person concerning Madoff</p> <p>8. All documents concerning investment, managerial, performance, operational, back office and other due diligence reviews, investigations, examinations, analyses, deliberations, meetings or recommendations, including but not limited to any business, legal, compliance, credit, financial, operational, quantitative, reputational, risk, suitability or supervisory</p>

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	<p>assessment or evaluation, by you or any other person concerning any Madoff Fund.</p> <p>9. All documents concerning investment, managerial, performance, operational, back office and other due diligence reviews, investigations, examinations, analyses, deliberations, meetings or recommendations, including but not limited to any business, legal, compliance, credit, financial, operational, quantitative, reputational, risk, suitability or supervisory assessment or evaluation, by you or any other person concerning any person other than any Madoff Fund that invested or transacted with, or whose funds were proposed to be managed by, Madoff, directly or indirectly.</p> <p>35. All documents sufficient to identify any persons that approved, offered or recommended any investment or transaction with Madoff, any Madoff Fund, or any other person that invested or transacted with Madoff, directly or indirectly, and all documents concerning any such offer or recommendation.</p> <p>43. All documents concerning your or any other person's policies, procedures and practices concerning due diligence, investigation, analysis, review or evaluation of any investment by you or any other person in any hedge fund, fund of funds or other similar investment vehicle, entity or instrument prior to or during the pendency of any such investment.</p>

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<p>5. Documents concerning, or Communications with, Montpellier International or Prince in connection with BLMIS or Legacy Capital.</p>	<p>2. All documents concerning any Madoff Fund, including without limitation Fairfield Greenwich and Tremont.</p> <p>3. All documents concerning any person other than any Madoff Fund that invested or transacted with, or whose funds were proposed to be managed by, Madoff, directly or indirectly.</p> <p>7. All documents concerning investment, managerial, performance, operational, back office and other due diligence reviews, investigations, examinations, analyses, deliberations, meetings or recommendations, including but not limited to any business, legal, compliance, credit, financial, operational, quantitative, reputational, risk, suitability, or supervisory assessment or evaluation, by you or any other person concerning Madoff</p> <p>8. All documents concerning investment, managerial, performance, operational, back office and other due diligence reviews, investigations, examinations, analyses, deliberations, meetings or recommendations, including but not limited to any business, legal, compliance, credit, financial, operational, quantitative, reputational, risk, suitability or supervisory assessment or evaluation, by you or any other person concerning any Madoff Fund.</p> <p>9. All documents concerning investment, managerial, performance, operational, back office and other due diligence reviews, investigations, examinations, analyses, deliberations, meetings or recommendations, including but not limited to any business, legal, compliance, credit, financial, operational, quantitative, reputational, risk, suitability or supervisory</p>

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	<p>assessment or evaluation, by you or any other person concerning any person other than any Madoff Fund that invested or transacted with, or whose funds were proposed to be managed by, Madoff, directly or indirectly.</p> <p>35. All documents sufficient to identify any persons that approved, offered or recommended any investment or transaction with Madoff, any Madoff Fund, or any other person that invested or transacted with Madoff, directly or indirectly, and all documents concerning any such offer or recommendation.</p> <p>43. All documents concerning your or any other person's policies, procedures and practices concerning due diligence, investigation, analysis, review or evaluation of any investment by you or any other person in any hedge fund, fund of funds or other similar investment vehicle, entity or instrument prior to or during the pendency of any such investment.</p> <p>46. All documents concerning any investment, accommodation, service or transaction offered, issued, executed, made or proposed to be made by you or any other person that was in any way related, linked or indexed to, invested in or secured or hedged by an investment in Madoff, any Madoff Fund, or any other person that invested or transacted with Madoff, directly or indirectly.</p> <p>48. All documents concerning your or any other person's investment or transaction with Madoff, any Madoff Fund, or any other person that invested or transacted with Madoff, directly or indirectly, including without limitation: (a)</p>



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	<p>monthly statements, including account numbers; (b) historical account balance information; (c) incoming and outgoing wire transfer records; (d) copies of checks (front and back), both deposited and drawn; (e) records reflecting cash activity; (f) account opening documents; (g) subscription agreements; (h) administrative or custodial agreement; (i) account closing documents; (j) redemption or liquidation requests; (k) all correspondence with fund personnel; (l) securities trade tickets and confirmations; and (m) periodic investment performance reviews and commentary.</p> <p>49. All documents concerning payments, subscriptions, or redemptions made by or to investors in any investment, accommodation, service or transaction offered, issued, executed, made or proposed to be made by you or any other person that was in any way related, linked or indexed to, invested in or secured or hedged by an investment in Madoff, any Madoff Fund or any person that invested or transacted with Madoff, directly or indirectly.</p> <p>51. All documents concerning remuneration, fees, commissions, compensation, revenues, profits, expenses, losses, reserve derived or resulting from any investment, accommodation, service or transaction offered, issued, executed, made or proposed to be made by you or any other person that were in any way related, linked or indexed to, invested in or secured or hedged by an investment in Madoff, any Madoff Fund or any other person that invested or transacted with Madoff, directly or indirectly.</p>
6. Documents concerning Prince's liquidation, including without limitation documents sufficient to	

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identify assets distributed to its partners, shareholders, or agents upon liquidation, and the value of any such distributions.	
7. Documents concerning Montpellier International's liquidation, including without limitation documents sufficient to identify assets distributed to its partners, shareholders, or agents upon liquidation, and the value of any such distributions.	
8. Documents concerning any insurance agreements relating to Montpellier International or Prince.	
9. Documents sufficient to Identify each person or entity having an interest (whether equity, security, debt, or other legal interest) in Prince, including without limitation partners, shareholders, or agents, specifying as to each the title and relationship to Prince and the value of the interest held by such person or entity in Prince.	<p>33. All documents sufficient to identify the names and addresses of any persons, and the beneficial owners or individual constituents of any such persons that are not natural persons, that invested or transacted directly or indirectly with Madoff, and all documents concerning such investments or transactions.</p> <p>47. All documents sufficient to show the names and addresses of all persons, including the beneficial owners or individual constituents of any such persons that are not natural persons, involved in any capacity in any investment, accommodation, service or transaction offered, issued, executed, made or proposed to be made by you or any other person that were in any way related, linked or indexed to, or invested in Madoff, any Madoff Fund, or any other person that invested or transacted with Madoff, directly or indirectly.</p>
10. Documents sufficient to Identify each person or entity having an interest (whether equity, security,	33. All documents sufficient to identify the names and addresses of any persons, and the beneficial owners or

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debt, or other legal interest) in Montpelier International, including without limitation partners, shareholders, or agents, specifying as to each the title and relationship to Montpelier International and the value of the interest held by such person or entity in Montpelier International.	individual constituents of any such persons that are not natural persons, that invested or transacted directly or indirectly with Madoff, and all documents concerning such investments or transactions.
11. Documents concerning all assets or property owned by Prince in whole or in part, including without limitation: (i) all checking and savings accounts; (ii) all balance sheets, profit and loss statements and income statements; (iii) stocks, bonds, trusts, and other securities, including cryptocurrency, in the name of or for the benefit of Prince; (iv) accounts receivable; (v) inventory; (vi) judgments held by Prince against third parties; (vii) rents receivable; and (viii) intellectual property.	
12. Documents concerning all assets or property owned by Montpelier International in whole or in part, including without limitation: (i) all checking and savings accounts; (ii) all balance sheets, profit and loss statements and income statements; (iii) stocks, bonds, trusts, and other securities, including cryptocurrency, in the name of or for the benefit of Montpelier International; (iv) accounts receivable; (v) inventory; (vi) judgments held by Montpelier International against third parties; (vii) rents receivable; and (viii) intellectual property.	

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13. Documents sufficient to identify Prince's beneficial owners.	<p>33. All documents sufficient to identify the names and addresses of any persons, and the beneficial owners or individual constituents of any such persons that are not natural persons, that invested or transacted directly or indirectly with Madoff, and all documents concerning such investments or transactions.</p> <p>47. All documents sufficient to show the names and addresses of all persons, including the beneficial owners or individual constituents of any such persons that are not natural persons, involved in any capacity in any investment, accommodation, service or transaction offered, issued, executed, made or proposed to be made by you or any other person that were in any way related, linked or indexed to, or invested in Madoff, any Madoff Fund, or any other person that invested or transacted with Madoff, directly or indirectly.</p>
14. Documents sufficient to identify Montpellier International's beneficial owners.	<p>33. All documents sufficient to identify the names and addresses of any persons, and the beneficial owners or individual constituents of any such persons that are not natural persons, that invested or transacted directly or indirectly with Madoff, and all documents concerning such investments or transactions.</p> <p>47. All documents sufficient to show the names and addresses of all persons, including the beneficial owners or individual constituents of any such persons that are not natural persons, involved in any capacity in any investment, accommodation, service or transaction offered, issued, executed, made or proposed to be made by you or any other person that were in any way related, linked or indexed to, or invested in Madoff,</p>

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	any Madoff Fund, or any other person that invested or transacted with Madoff, directly or indirectly.
15. Documents concerning Prince's credit facility agreement with Santander Bank & Trust Limited dated June 27, 2005 and the related assignment to Banco Santander (Suisse) S.A. dated June 1, 2010.	46. All documents concerning any investment, accommodation, service or transaction offered, issued, executed, made or proposed to be made by you or any other person that was in any way related, linked or indexed to, invested in or secured or hedged by an investment in Madoff, any Madoff Fund, or any other person that invested or transacted with Madoff, directly or indirectly.
16. Documents concerning the pledge agreement dated October 16, 2009 between Auber Investments Limited and Santander Bank & Trust Limited relating to Prince's credit facility agreement.	46. All documents concerning any investment, accommodation, service or transaction offered, issued, executed, made or proposed to be made by you or any other person that was in any way related, linked or indexed to, invested in or secured or hedged by an investment in Madoff, any Madoff Fund, or any other person that invested or transacted with Madoff, directly or indirectly.
17. Documents concerning the relationship between Auber Investments Limited and Prince.	<p>33. All documents sufficient to identify the names and addresses of any persons, and the beneficial owners or individual constituents of any such persons that are not natural persons, that invested or transacted directly or indirectly with Madoff, and all documents concerning such investments or transactions.</p> <p>47. All documents sufficient to show the names and addresses of all persons, including the beneficial owners or individual constituents of any such persons that are not natural persons, involved in any capacity in any investment, accommodation, service or transaction offered, issued, executed, made or proposed to be made by you or any other person that were in</p>

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	any way related, linked or indexed to, or invested in Madoff, any Madoff Fund, or any other person that invested or transacted with Madoff, directly or indirectly.